

## R E M A R K S

Claims 1-13 are pending in the application. Claims 1-13 are rejected.

Independent claims 1 and 9 have been amended to clarify applicant's claimed invention.

In addition "a fixed network local exchange" has been amended to an "exchange." No new matter is entered.

Applicant's claimed invention describes disposing a SW between a group of base stations and a BSC for enabling the group of base stations to mutually exchange information. Applicant's claimed invention relates to, instead of propagating the signal through a public communication network, establishing a connection between inter-controller SW devices that are disposed on respective lines each connecting between a base-station and a base-station controller.

Applicant's base station controllers are subordinate to the exchange. Communication occurs between the inter-controller SW devices that are disposed on respective lines each connecting between a base-station and a base-station controller.

### Claim Rejections

Claims 1-5 and 9-13 are rejected under 35 USC 103(a) as unpatentable over Beming in view of Abu-Amara (US 6,173,183) and in view of Sasamoto (US 6,647,264). Claim 6 and 7 are rejected under 35 USC 103(a) with claim 6 being rejected further in view of Hanley and claim 7 being rejected further in view of Mitts. Claim 8 is likewise rejected over the combinations applied to claim 7 and further in view of Clancy.

It is asserted in the Office Action that Sasamoto describes a plurality of routers arranged under the same one MSC and the routers are located apart from the base station controller.

The Office Action asserts, on the other hand, that Abu-Amara describes connecting between routers arranged under mutually different MSCs, a source MSC and a target MSC. The routers 265 & 220 of Abu-Amara are under the control of respectively different MSCs. In addition the Office Action points out that the router is part of the base station controller.

It is respectfully submitted that neither reference suggests such a combination as recited by applicant. The references are using directly opposite configurations and make no suggestion of connecting between routers arranged under the same one MSC.

The Office Action asserts that such would be obvious for reliable or faster communication handling. However applicant could not find any such suggestion in the references or knowledge known to one skilled in the art.

Applicant's respectfully request a clarification as to where such suggestion may be found or please point out another reference providing such a suggestion. Applicant does not believe one can arrive at connecting SWs subordinate to the same one exchange based on a combination of these two technologies. Applicant's own disclosure is being used as a roadmap to arrive at such a combination of references.

The Abu-Amara reference describes providing a router in each base-station controller for connecting the router with another router so that it becomes possible for base-station controllers to exchange signals directly with each other. However, the Office Action asserts that Abu-Amara discloses that the router is part of the base station controller.

Abu-Amara describes providing a router in each base-station controller for connecting the router with another router so that it becomes possible for base-station controllers to exchange signals directly with each other.

In contrast, a router and an MSC of Sasamoto are to assume respectively different types of data, in particular, the router of Sasamoto is to handle packet form data and the MSC of Sasamoto is to be involved in a telephone service (see col. 3, lines 40-60).

If one applied this technology of Sasamoto to that of Abu-Amara, one would arrive at a configuration in which it becomes impossible for a BSC and a router to mutually exchange information when the router is cut off from the BSC. This configuration, therefore, does not enable a BSC and an SW to mutually exchange information and is different from the present claimed invention.

It is respectfully submitted that the combination of references fails to describe or suggest each feature of the claimed invention and in addition lack a motivation to make such a combination.

In view of the remarks set forth above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is invited to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,



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